

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NORTHEASTERN DIVISION**

UNITED STATES OF AMERICA

v.

GEORGIANNA A.M. GIAMPIETRO

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**Case No. 2:19-cr-00013
Chief Judge Crenshaw**

**MOTION TO EXCUSE APPEARANCE OF
CO-COUNSEL PETER J. STRIANSE, ESQ.,
AT OCTOBER 19, 2020 EVIDENTIARY HEARING**

COMES NOW the Defendant, **Georgianna A.M. Giampietro**, by and through her undersigned counsel, and respectfully requests that this Honorable Court enter an Order excusing the appearance of Co-Counsel Peter J. Strianse, Esq., of the Nashville Bar, at the October 19, 2020 hearing on the Defendant's Motion in Limine regarding Fed. R. Evid. 404(b). In support hereof, Co-Counsel for Defendant Giampietro states as follows:

1. Ms. Giampietro is represented in this case by Charles D. Swift, Esq., Constitutional Law Center for Muslims in America, as Lead Counsel, and by Peter J. Strianse, Esq., of the Nashville Bar as Co-Counsel/Local Counsel.

2. On August 3, 2020, Mr. Swift filed a *Motion in Limine Regarding 404(b) Evidence* on behalf of Ms. Giampietro. (Docket Entry 143). Mr. Swift did all of the research and writing on this motion and will be the lawyer arguing the motion before this Court.

3. On September 21, 2020, this Court entered an Order setting Mr. Swift's 404(b) motion "for an evidentiary hearing on October 19, 2020, at 9:00 a.m." (Docket Entry 147, Page ID# 1968).

4. Weeks ago, undersigned counsel's family made airline and hotel reservations for a short, out-of-state vacation, from Friday, October 16, 2020, through and including, Tuesday,

October 20, 2020. Given counsel's work schedule, he rarely is able to accompany his family on vacations.

5. Undersigned counsel has discussed this request with Lead Counsel, Charles Swift, who confirmed that he intends to argue the motion and is not opposed to undersigned counsel's appearance being excused by the Court. Prior to the October 19, 2020 evidentiary hearing, undersigned counsel will travel to the Daviess County Detention Center in Owensboro, Kentucky, to meet with Ms. Giampietro and secure her consent to the waiving of counsel's appearance at the hearing.

WHEREFORE, based on the foregoing, Defendant Georgianna A.M. Giampietro respectfully requests that this Honorable Court enter an Order excusing the appearance of Co-Counsel Peter J. Strianse, Esq., of the Nashville Bar, at the October 19, 2020 hearing on the Defendant's Motion in Limine regarding Fed. R. Evid. 404(b).

Respectfully submitted,

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S/ Peter Strianse
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S/ Charles D. Swift
CHARLES D. SWIFT
Attorney for Defendant Giampietro

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been sent via the Court's electronic filing system unless not registered and, in that event deposited in the United States mail, postage prepaid, to:

Ben Schrader
Philip H. Wehby
Assistant United States Attorneys
110 Ninth Avenue South, Suite A961
Nashville, TN 37203-3870

this 23rd day of September, 2020.

S/ Peter J. Strianse
PETER J. STRIANSE